

1 Lee Gelernt*
2 Judy Rabinovitz*
3 Anand Balakrishnan*
4 AMERICAN CIVIL LIBERTIES
5 UNION FOUNDATION
6 IMMIGRANTS' RIGHTS PROJECT
7 125 Broad St., 18th Floor
8 New York, NY 10004
9 T: (212) 549-2660
10 F: (212) 549-2654
11 *lgelernt@aclu.org*
12 *jrabinovitz@aclu.org*
13 *abalakrishnan@aclu.org*

Attorneys for Petitioner-Plaintiff
**Admitted Pro Hac Vice*

Bardis Vakili (SBN 247783)
ACLU FOUNDATION OF SAN
DIEGO &
IMPERIAL COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
T: (619) 398-4485
F: (619) 232-0036
bvakili@aclusandiego.org

Stephen B. Kang (SBN 292280)
Spencer E. Amdur (SBN 320069)
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
39 Drumm Street
San Francisco, CA 94111
T: (415) 343-1198
F: (415) 395-0950
skang@aclu.org
samdur@aclu.org

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Ms. L., et al.,

Petitioner-Plaintiff,
v.

U.S. Immigration and Customs
Enforcement ("ICE"), et al.,

Respondents-Defendants.

Case No. 18-cv-00428-DMS-MDD

Date Filed: June 6, 2019

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO FILE
RESTRICTED EXHIBITS**

1 Plaintiffs respectfully request that the Court permit the filing of restricted
2 exhibits.

3 Plaintiffs seek to seal Exhibits D, E, F, and G in support of Plaintiffs' Motion
4 to Allow Parents Deported Without Their Children to Travel to the United States,
5 ECF 418:

- 6 • Exhibit D is an addendum containing the applications submitted pursuant to
7 the Settlement Agreement by the 21 deported parents seeking return;
- 8 • Exhibit E is an addendum containing the applications submitted by the 30
9 deported parents who have already returned;
- 10 • Exhibit F is an addendum containing excerpts of the parole applications
11 submitted by three parents and their denials;
- 12 • Exhibit G is a Declaration of Dr. Cohen, a child psychiatrist, containing a
13 mental health evaluation of a deported parent seeking return and their child.

14 The exhibits contain the names, locations, and alien numbers of members of
15 the class, as well as sensitive mental health information. The class members face
16 persecution and their safety could be endangered if their identities or identifying
17 information were disclosed.

18 For their privacy and safety, Plaintiffs request permission to file these
19 exhibits under seal.
20
21
22
23
24
25
26
27
28

1 Dated: June 6, 2019

Respectfully Submitted,

2
3 Bardis Vakili (SBN 247783)
4 ACLU FOUNDATION OF SAN
5 DIEGO & IMPERIAL COUNTIES
6 P.O. Box 87131
7 San Diego, CA 92138-7131
8 T: (619) 398-4485
9 F: (619) 232-0036
10 *bvakili@aclusandiego.org*

11 Stephen B. Kang (SBN 2922080)
12 Spencer E. Amdur (SBN 320069)
13 AMERICAN CIVIL LIBERTIES
14 UNION FOUNDATION
15 IMMIGRANTS' RIGHTS PROJECT
16 39 Drumm Street
17 San Francisco, CA 94111
18 T: (415) 343-1198
19 F: (415) 395-0950
20 *skang@aclu.org*
21 *samdur@aclu.org*

/s/Lee Gelernt
Lee Gelernt*
Judy Rabinovitz*
Anand Balakrishnan*
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
IMMIGRANTS' RIGHTS PROJECT
125 Broad St., 18th Floor
New York, NY 10004
T: (212) 549-2660
F: (212) 549-2654
lgelernt@aclu.org
jrabinovitz@aclu.org
abalakrishnan@aclu.org

**Admitted Pro Hac Vice*